

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In Re: ) 15-20199  
)  
YVETTE MARSHALL, ) Chapter 13  
)  
Debtor(s). ) Judge CASSLING

**NOTICE OF MOTION**

*To the following persons or entities who were served via electronic mail by the Bankruptcy Court:*

U.S. Bankruptcy Trustee: USTPRegion11.ES.ECF@usdoj.gov  
Tom Vaugh, Chapter 13 Trustee: ecf@tvch13.net

*To the following persons or entities who were served via regular U.S. Mail:*

See attached service list

PLEASE TAKE NOTICE that I shall appear before the following named Bankruptcy Judge, or any other Judge presiding in his stead at 219 South Dearborn Street, Chicago, Illinois, and in the following courtroom (or any other place posted), and present the attached **Motion to Re-Open the Case to Enter a Discharge**, at which time and place you may appear:

JUDGE: CASSLING  
ROOM: 619  
DATE: May 2, 2019  
TIME: 9:30 a.m.

/s/ David M. Siegel

**PROOF OF SERVICE**

The undersigned does hereby certify that copies of this Notice and attachments were served to the above persons or entities, if service by mail was indicated above, by depositing same in the U.S. Mail at Wheeling, Illinois 60090, with proper postage prepaid, or served electronically by the Bankruptcy Court, before 5:00 p.m. on April 10, 2019.

/s/ David M. Siegel

David M. Siegel, A.R.D.C. #6207611  
Attorney for the Debtor(s)

DAVID M. SIEGEL & ASSOCIATES, LLC  
790 Chaddick Drive  
Wheeling, IL 60090  
847/ 520-8100

To the following persons or entities who were served via regular U.S. Mail:

Yvette Marshall  
25 Schrum Rd.  
Calumet City, IL 60409

AT&T, Bankruptcy Dept.  
1585 Waukegan Rd.  
Waukegan, IL 60085

City of Calumet City  
Water Dept.  
204 Pulaski Rd.  
Calumet City, IL 60409-4115

City of Chicago, Dept. of Revenue  
P.O. box 88292  
Chicago, IL 60680

City of Chicago, Dept. of Finance  
Arnold Scott Harris  
111 W. Jackson, Ste. 600  
Chicago, IL 60604

Convergent Outsourcing  
P.O. box 9004  
Renton, WA 98057

Cook County Clerk  
118 N. Clark St., Rm. 112  
Chicago, IL 60602

Cook County Treasurer  
P.O. Box 4488  
Carol Stream, IL 60197

Creditors Discount & Audit  
P.O. Box 213  
Streator, IL 61364

Fifth Third Bank  
Bankruptcy Dept.  
1850 East Paris SE  
Grand Rapids, MI 49546

MCOA  
3348 Ridge Rd.  
Lansing, IL 60438

Markoff & Krasny  
29 N. Wacker Drive  
Chicago, IL 60606

National Account Services  
1246 University Ave. W, #421  
St. Paul, MN 55104

National Payment Center  
P.O. box 105028  
Atlanta, GA 30348

PLS  
16909 Torrence Ave.  
Lansing, IL 60438

US Dept. of Education  
P.O. Box 5609  
Greenville, TX 75403-5609

US Dept. of Education  
Bankruptcy Dept.  
P.O. Box 65128  
St. Paul, MN 55165

West Asset Management  
Bankruptcy Dept.  
7171 Meercy Rd., Ste. 150  
Omaha, NE 68106-2611

Wheeler Financial Services  
535 Washington Way, Ste. 240  
Lexington, KY 40503

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NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

<b>In Re:</b>	)	<b>15-20199</b>
	)	
<b>YVETTE MARSHALL,</b>	)	<b>Chapter 13</b>
	)	
<b>Debtor(s).</b>	)	<b>Judge CASSLING</b>

**MOTION TO RE-OPEN CASE TO ENTER A DISCHARGE**

NOW COME the Debtor, by and through her attorneys, DAVID M. SIEGEL & ASSOCIATES, LLC to present their Motion, and in support thereof state as follows:

1. Jurisdiction is proper and venue is fixed in this Court with respect to these parties.
2. The Debtor filed a petition for relief pursuant to Chapter 13 under Title 11 USC on June 10, 2015. Tom Vaughn was appointed Trustee in this case.
3. The Trustee filed a Notice of Completion of Plan Payments on February 20, 2019.
4. A Notice to Individual Debtors in Chapter 13 Cases of Required Documents for Discharge was filed by the Court on February 20, 2019 and February 21, 2019.
5. The case was closed without discharge on April 4, 2019.
6. The Chapter 13 Debtor's Certifications Regarding Domestic Support Obligations and Section 522(q) was filed the next day, on April 5, 2019.
7. The delay was due to an inadvertent oversight by the Debtor. The delay was unintentional, and was not done to cause harm to creditors of the Debtor.
6. The Debtor seeks leave of the court to allow the late filing of the Debtor's Certifications Regarding Domestic Support Obligations and Section 522(q); and requests that the court re-open the case and direct the Clerk of the Bankruptcy Court to issue an order of discharge.

WHEREFORE, the Debtor, Yvette Marshall, prays that this Honorable Court enter an Order to allow late filing of Debtor's Certifications Regarding Domestic Support Obligations and Section 522(q) document, to re-open the case, to direct the issue of an order of discharge, and for such other relief that the Court deems just and proper.

Respectfully Submitted,

/s/ David M. Siegel

David M. Siegel, A.R.D.C. #6207611  
Attorney for the Debtor(s)

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790 Chaddick Drive  
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